

EXHIBIT E

IN THE DISTRICT COURT OF THE UNITED STATES
FOR THE EASTERN DISTRICT OF WISCONSIN

DANIEL MCGRAW AND
SUSAN MCGRAW,

Plaintiffs,

vs. Civil Action No. 1:15-CV-1424-WCG

SUPERIOR AVIATION, LTD.,
KUBICK AVIATION SERVICES, INC.,
and QBE INSURANCE CORP.,
Defendants.

The Videotaped Deposition of TIMOTHY SPREEN,
Taken at 2501 Worldgateway Place, Cortez Room,
Romulus, Michigan,
Commencing at 5:34 p.m.,
Monday, June 27, 2016,
Before Kathryn L. Janes, CSR-3442, RMR, RPR.

<p style="text-align: right;">Page 6</p> <p>1 themselves and the parties they represent. Our court</p> <p>2 reporter, Kathy Janes, representing Veritext will</p> <p>3 swear in the witness and we can proceed.</p> <p>4 MR. TECHMEIER: My name is Will Techmeier.</p> <p>5 I represent Daniel and Susan McGraw.</p> <p>6 MR. LORINGER: John Loring for Defendant,</p> <p>7 Superior Aviation.</p> <p>8 MR. KLINGAMAN: Russ Klingaman at Hinshaw &</p> <p>9 Culbertson for Defendant, Kubick Aviation.</p> <p>10 TIMOTHY SPREEN,</p> <p>11 was thereupon called as a witness herein, and after</p> <p>12 having first been duly sworn to testify to the truth,</p> <p>13 the whole truth and nothing but the truth, was</p> <p>14 examined and testified as follows:</p> <p>15</p> <p>16 EXAMINATION</p> <p>17 BY MR. LORINGER:</p> <p>18 Q. Could you please state your name and spell your last</p> <p>19 name for the record?</p> <p>20 A. Timothy Sreen, S-P-R-E-E-N.</p> <p>21 Q. Mr. Sreen, we've talked before today, my name is John</p> <p>22 Loring. I'm representing Superior Aviation in this</p> <p>23 case. We appreciate you being here today. My</p> <p>24 understanding is, one, you are currently employed by</p> <p>25 the FAA, correct?</p>	<p style="text-align: right;">Page 8</p> <p>1 of response, that's for the benefit of the court</p> <p>2 reporter so she doesn't have to try to take down two</p> <p>3 people talking at the same time, okay?</p> <p>4 A. Okay.</p> <p>5 Q. If I remind you of that, and it happens at every</p> <p>6 deposition, I'm not trying to be rude, it's just for</p> <p>7 the sake of the court reporter, okay?</p> <p>8 A. (Witness nods head affirmatively.)</p> <p>9 Q. Please let me know if you don't understand one of my</p> <p>10 questions, I'll be happy to rephrase it or ask it</p> <p>11 again, fair?</p> <p>12 A. Fair.</p> <p>13 Q. Okay. What's your date of birth, Tim?</p> <p>14 A. October 25, 1970.</p> <p>15 Q. Okay. Where were you born?</p> <p>16 A. Escanaba, Michigan.</p> <p>17 Q. Okay. Can you summarize your educational background</p> <p>18 for me?</p> <p>19 A. Six years U.S. Army, I left the army in 1995, went to</p> <p>20 Northern Michigan University, graduated with an</p> <p>21 Associate Degree in science and aircraft maintenance</p> <p>22 and technology. Which soon after, I obtained my A & P</p> <p>23 license, started working for Superior Aviation in</p> <p>24 1997, worked with them for ten years. And soon after,</p> <p>25 around 2006, 2007, I started my own aircraft</p>
<p style="text-align: right;">Page 7</p> <p>1 A. That's correct.</p> <p>2 Q. Okay. And secondly, you have a statement to read onto</p> <p>3 the record today, correct?</p> <p>4 A. I do.</p> <p>5 Q. From FAA Legal?</p> <p>6 A. Correct.</p> <p>7 Q. Yeah, why don't go ahead and do that, please.</p> <p>8 A. My opening statement would be that I would like a copy</p> <p>9 of the deposition and that I am going to read it and</p> <p>10 sign it. Also I'd like to make a statement on the</p> <p>11 record that under 49 C.F.R., Part 9, I am prohibited</p> <p>12 from testifying as to matters related to my FAA</p> <p>13 employment or giving any opinion testimony.</p> <p>14 Q. Okay, thanks, Tim. And if -- I'll start by asking you</p> <p>15 some questions and I'll keep that in mind, those</p> <p>16 admonitions, but again, of course, I'll try to stay</p> <p>17 away from your opinions, but if that comes up or you</p> <p>18 feel we're getting into that territory somehow, please</p> <p>19 let us know, okay?</p> <p>20 A. Okay.</p> <p>21 Q. Fair?</p> <p>22 A. Fair.</p> <p>23 Q. Just a couple ground rules, we talked before, but just</p> <p>24 kind of how the deposition is going to proceed. Just</p> <p>25 let me get my question out before you offer any type</p>	<p style="text-align: right;">Page 9</p> <p>1 maintenance business at the Menomonee County Airport.</p> <p>2 And I ran the airport as an airport manager and ran an</p> <p>3 aircraft maintenance business.</p> <p>4 Q. Okay. Let's talk about your education for a second,</p> <p>5 what year did you graduate from Northern Michigan?</p> <p>6 A. 1997.</p> <p>7 Q. Okay. And what was your degree in when you graduated?</p> <p>8 A. It was an Associate in applied science and aircraft</p> <p>9 maintenance and technology which is a required class</p> <p>10 or required course to take to get your A & P license.</p> <p>11 Q. Okay. And then after graduation, did you seek your A</p> <p>12 & P certification?</p> <p>13 A. Correct.</p> <p>14 Q. And what did that entail?</p> <p>15 A. It entailed taking a written test.</p> <p>16 Q. How many tests, is it one or more?</p> <p>17 A. It's one test.</p> <p>18 Q. Okay. Did you pass on the first occasion?</p> <p>19 A. Yes.</p> <p>20 Q. Okay. So you became a licensed A & P in 1997?</p> <p>21 A. Correct.</p> <p>22 Q. Okay. Do you also have your Inspection Authorization?</p> <p>23 A. I do.</p> <p>24 Q. Okay. First, generally what's an Inspection</p> <p>25 Authorization?</p>

<p style="text-align: right;">Page 10</p> <p>1 A. It gives you the authority to sign annual inspections 2 and major repairs.</p> <p>3 Q. Okay. When did you -- when did you get that, your IA?</p> <p>4 A. Roughly four years afterwards.</p> <p>5 Q. Okay.</p> <p>6 A. After I received my A & P, it's a requirement, you 7 have to have at least three years before you can take 8 it as an A & P mechanic.</p> <p>9 Q. Is there a test associated with becoming an IA?</p> <p>10 A. Yes.</p> <p>11 Q. Okay. One test?</p> <p>12 A. Yes.</p> <p>13 Q. Okay. And are you currently a licensed A & P?</p> <p>14 A. Correct.</p> <p>15 Q. And are you currently a licensed IA?</p> <p>16 A. Yes.</p> <p>17 Q. Are you also a pilot?</p> <p>18 A. I am.</p> <p>19 Q. Okay. When did you become a licensed pilot?</p> <p>20 A. 12 years ago.</p> <p>21 Q. Okay. What ratings do you hold?</p> <p>22 A. Single Engine Land.</p> <p>23 Q. Okay. Have you had a Single Engine Land rating 24 consistently over the last 12 years, actively over the 25 last 12 years?</p>	<p style="text-align: right;">Page 12</p> <p>1 graduated at Superior?</p> <p>2 A. Mechanic.</p> <p>3 Q. Okay. So when you passed your A & P exam, you became 4 a mechanic, your title at Superior became mechanic?</p> <p>5 A. Correct.</p> <p>6 Q. Okay. And how long were you a mechanic at Superior 7 for them?</p> <p>8 A. Roughly ten years.</p> <p>9 Q. Okay. Any other job during those ten years or were 10 you only working for Superior at that time?</p> <p>11 A. I believe it was I had a stint with -- with Brooks 12 Aviation for a year and then went back with Superior, 13 but I don't really remember what year that was.</p> <p>14 Q. Also a mechanic at Brooks?</p> <p>15 A. Correct.</p> <p>16 Q. Okay. And then where did you go after ten years at 17 Superior, so this is about 2007?</p> <p>18 A. Correct, 2006, 2007, I started my own aircraft 19 maintenance business.</p> <p>20 Q. And what was the name of that business?</p> <p>21 A. Spreen Aviation.</p> <p>22 Q. Were you based at a particular airport?</p> <p>23 A. I had my local address as my base, but then I used 24 Menomonee County Airport as my fixed base.</p> <p>25 Q. And how long did you -- were you working with your own</p>
<p style="text-align: right;">Page 11</p> <p>1 A. Correct.</p> <p>2 Q. Okay. How many flight hours do you have?</p> <p>3 A. Roughly 900.</p> <p>4 Q. Okay. Do any of those 9 -- 900 hours include time in 5 a Lancair?</p> <p>6 A. No.</p> <p>7 Q. How much, just for background, how much have you flown 8 in the last year and a half or so?</p> <p>9 A. Less than ten hours.</p> <p>10 Q. Okay. You were in the army for six years before 11 Northern Michigan?</p> <p>12 A. Correct.</p> <p>13 Q. Okay. What -- what was your -- what was your rank in 14 the army?</p> <p>15 A. A specialist, E4.</p> <p>16 Q. Okay. Honorable discharge?</p> <p>17 A. Correct.</p> <p>18 Q. You graduated from Northern Michigan in about 1997 and 19 then some time shortly after graduation, you go to 20 work for Superior?</p> <p>21 A. I took an internship with Superior. I shouldn't say 22 an internship, I took a job with Superior Aviation 23 prior to my leaving college and then finished college 24 while working for Superior.</p> <p>25 Q. Okay. So when -- what was your title after you</p>	<p style="text-align: right;">Page 13</p> <p>1 business, Spreen Aviation?</p> <p>2 A. Until 2011, when I joined forces with Bruce Varda and 3 Superior Aviation.</p> <p>4 Q. Okay. So for about three or four years, you had 5 Spreen Aviation?</p> <p>6 A. Five.</p> <p>7 Q. Five years.</p> <p>8 A. 2011.</p> <p>9 Q. Got it. 2011, you went back to Superior?</p> <p>10 A. Correct, got it.</p> <p>11 Q. What was your title when you went back to Superior?</p> <p>12 A. Director of maintenance and supervisor of maintenance.</p> <p>13 Q. Going back for a second, I think when you were talking 14 earlier, Tim, you mentioned working at FBO; is that 15 correct? Did you -- did you do maintenance at FBO or 16 am I --</p> <p>17 A. It was -- it was not at FBO, it was a -- the airport 18 that I managed that I rented a hanger and performed 19 maintenance for the aircraft on the field.</p> <p>20 Q. Is this for -- this is for your time during Spreen 21 Aviation?</p> <p>22 A. Correct.</p> <p>23 Q. Got it. Did you have any employees at Spreen 24 Aviation?</p> <p>25 A. No.</p>

<p style="text-align: right;">Page 22</p> <p>1 A. Yes.</p> <p>2 Q. Okay. Is that your signature there, about a third or</p> <p>3 halfway down?</p> <p>4 A. It is.</p> <p>5 Q. Okay. And again, your A & P number?</p> <p>6 A. Correct.</p> <p>7 Q. Did you write this entry, do you recall?</p> <p>8 A. Yes, I did write it.</p> <p>9 Q. Okay. Do you recognize this to be a log entry from</p> <p>10 Mr. McGraw's Lancair?</p> <p>11 A. Correct.</p> <p>12 Q. Could you slowly read what is written here just so I</p> <p>13 make sure we have a correct understanding of what's</p> <p>14 stated?</p> <p>15 MR. KLINGAMAN: Excuse me, John, if you</p> <p>16 could give dates or more descriptions, I don't have a</p> <p>17 Bates set of these documents, just so I could follow</p> <p>18 along.</p> <p>19 MR. LORINGER: Sure, sorry. It is Bates</p> <p>20 page Plaintiff 84, it's a log entry from February 7,</p> <p>21 2014.</p> <p>22 MR. KLINGAMAN: Okay, the date helped,</p> <p>23 thank you.</p> <p>24 MR. LORINGER: Yep.</p> <p>25 A. Date 2-7-14, 278.50 inspected aircraft, IAW, which is</p>	<p style="text-align: right;">Page 24</p> <p>1 were removed, the fuel sending -- the fuel sending</p> <p>2 units were installed. I believe there was quite a few</p> <p>3 hoses replaced on the engine. I believe the engine</p> <p>4 may have been -- excuse me, the engine -- the</p> <p>5 propeller was taken off. Some attaching hardware to</p> <p>6 the engine were replaced.</p> <p>7 Q. Okay. Just to clarify, you said some hoses were</p> <p>8 replaced, you don't know which hoses were replaced, do</p> <p>9 you?</p> <p>10 A. I believe they were --</p> <p>11 MR. TECHMEIER: Leading -- wait a minute,</p> <p>12 excuse me, leading.</p> <p>13 BY MR. LORINGER:</p> <p>14 Q. Go ahead.</p> <p>15 A. I believe -- excuse me, they were oil hoses.</p> <p>16 Q. Okay. Explain for me, if you could -- well, strike</p> <p>17 that.</p> <p>18 It would be possible, Mr. Spreen, to sign</p> <p>19 off in February of 2014 as for this aircraft to be</p> <p>20 airworthy and still have those repairs to be done; is</p> <p>21 that correct?</p> <p>22 MR. TECHMEIER: Objection, leading.</p> <p>23 A. That is correct.</p> <p>24 BY MR. LORINGER:</p> <p>25 Q. Okay. Explain that for me, if you could, how, if you</p>
<p style="text-align: right;">Page 23</p> <p>1 an in accordance with, an annual, slash, condition</p> <p>2 inspection. Inspected ELT in accordance with</p> <p>3 91.207(d). Battery expiration date March 2017.</p> <p>4 I certify that this airframe was inspected</p> <p>5 in accordance with an annual condition inspection and</p> <p>6 was found airworthy for return to service. My</p> <p>7 signature, 2881558IA.</p> <p>8 BY MR. LORINGER:</p> <p>9 Q. Okay. And is the date there, the 2-7-14, is that when</p> <p>10 you would have made this entry?</p> <p>11 A. That would have been the date I made the entry.</p> <p>12 Q. Okay. Do you know if there was any repair or</p> <p>13 maintenance work done to the aircraft after this date,</p> <p>14 but before Mr. McGraw picked it up on about April 10th</p> <p>15 of 2014?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. Do you have a general understanding,</p> <p>18 Mr. Spreen, of what that work was that was done, that</p> <p>19 repair and maintenance work?</p> <p>20 A. Brief.</p> <p>21 Q. Okay, what's your -- what's your brief understanding</p> <p>22 of what it was? And I can show you the documents,</p> <p>23 I'll show you some of the log entries in a second, but</p> <p>24 I'm just trying to see what your memory is?</p> <p>25 A. Considerable work done on the fuel system, the wings</p>	<p style="text-align: right;">Page 25</p> <p>1 were going to explain to a layperson, someone not in</p> <p>2 the aviation maintenance industry, how would you</p> <p>3 explain how you could have a signoff on airworthy in</p> <p>4 February and still have subsequent repair work done</p> <p>5 before the pickup a couple months later?</p> <p>6 A. The aircraft was inspected. It was found to be</p> <p>7 airworthy. There were other items that were asked to</p> <p>8 either be done or we had talked to the customer that</p> <p>9 said that maybe this is a good time to get these done.</p> <p>10 It doesn't mean that the aircraft is un-worthy --</p> <p>11 un-airworthy at the time. It is airworthy, but they</p> <p>12 continued to do maintenance on it after the</p> <p>13 inspection.</p> <p>14 Q. Okay. But from your perspective in February, when you</p> <p>15 signed off on this, February 7, 2014, the aircraft was</p> <p>16 airworthy, correct?</p> <p>17 MR. TECHMEIER: Objection, leading.</p> <p>18 A. The aircraft was airworthy.</p> <p>19 BY MR. LORINGER:</p> <p>20 Q. Okay. Mr. McGraw could have come and picked it up</p> <p>21 then and it would be airworthy, correct?</p> <p>22 MR. TECHMEIER: Objection, leading.</p> <p>23 A. At that point, yes.</p> <p>24 MR. TECHMEIER: Can you ask a non-leading</p> <p>25 question?</p>

<p style="text-align: right;">Page 26</p> <p>1 MR. LORINGER: Your objections are fine.</p> <p>2 You can make your objection.</p> <p>3 MR. TECHMEIER: I'm probably going to</p> <p>4 object to a lot of questions from now on, so.</p> <p>5 BY MR. LORINGER:</p> <p>6 Q. So I understand, Mr. Spreen, were you involved in</p> <p>7 any -- involved -- were you doing any actual repairs</p> <p>8 to Mr. McGraw's aircraft after you signed off on it on</p> <p>9 February 7, 2014?</p> <p>10 A. Not 100 percent, no.</p> <p>11 Q. Okay. Can you describe that for me, what do you mean?</p> <p>12 A. If -- if the mechanics needed help, I would help them.</p> <p>13 Q. Okay. Do you recall anything you did specifically?</p> <p>14 A. No, nothing specifically.</p> <p>15 Q. Okay. Who is it at Superior that did a majority of</p> <p>16 the work then on the repair work after the condition</p> <p>17 inspection?</p> <p>18 A. Alex Dupras and Vincent Quadrani.</p> <p>19 Q. And of those two, do you know which one did more or</p> <p>20 less or do you know what the breakdown was?</p> <p>21 A. They worked in conjunction with each other.</p> <p>22 Q. Okay. As you sit here today, do you recall what Alex</p> <p>23 did and what Vincent may have done?</p> <p>24 A. I can't say one from the other.</p> <p>25 Q. Okay. During this condition inspection that you</p>	<p style="text-align: right;">Page 28</p> <p>1 have checked the tightness of all the fuel lines with</p> <p>2 a torque wrench?</p> <p>3 A. No.</p> <p>4 Q. Okay. Why not?</p> <p>5 A. It doesn't require us to per the checklist that we use</p> <p>6 that's offered in the 43 -- 43 Appendix D.</p> <p>7 Q. Okay.</p> <p>8 MARKED FOR IDENTIFICATION:</p> <p>9 DEPOSITION EXHIBIT 4</p> <p>10 6:05 p.m.</p> <p>11 BY MR. LORINGER:</p> <p>12 Q. Let me show you another document, it's a set of three</p> <p>13 pages stapled together, Bates labeled Plaintiff 305,</p> <p>14 306 and 307.</p> <p>15 MR. LORINGER: And for Russ, these are the</p> <p>16 log entries dated April 10th, those three log entries,</p> <p>17 the typed-out ones.</p> <p>18 MR. KLINGAMAN: Thank you.</p> <p>19 BY MR. LORINGER:</p> <p>20 Q. Mr. Spreen, take a look at these and let me know when</p> <p>21 you're done looking at them. Okay. Did you get a</p> <p>22 chance to look at them?</p> <p>23 A. I did.</p> <p>24 Q. Have you seen these before?</p> <p>25 A. Yes, I have.</p>
<p style="text-align: right;">Page 27</p> <p>1 signed off on that we've looked at as exhibit -- which</p> <p>2 one is that -- as Exhibit 3, February 7, 2014, do you</p> <p>3 recall if you inspected the fuel line connections</p> <p>4 during that condition inspection?</p> <p>5 A. It was part of the checklist, I did inspect it.</p> <p>6 Q. Okay. And how would you have done that inspection?</p> <p>7 A. Visually.</p> <p>8 Q. Okay. And -- and when you say visually, what are you</p> <p>9 looking for in regards to the fuel connections?</p> <p>10 A. Well, you look for any foreign substance as a, like a</p> <p>11 blue dye, if you're inspecting a fuel line, it would</p> <p>12 be oil, if you're inspecting an oil line, maybe a</p> <p>13 chafing, a hose that may be misaligned.</p> <p>14 Q. Okay. When you -- when you say chafing, what do you</p> <p>15 mean?</p> <p>16 A. Maybe I misspoke, maybe a fretting.</p> <p>17 Q. Okay. And but what -- when you say fretting, what do</p> <p>18 you mean, what are you thinking of?</p> <p>19 A. You'll see a black residue of metal surfaces rubbing</p> <p>20 together.</p> <p>21 Q. And if you see any of those, then what would you have</p> <p>22 done?</p> <p>23 A. Investigate to find out where the -- where the --</p> <p>24 where that's coming from.</p> <p>25 Q. Okay. During this condition inspection, would you</p>	<p style="text-align: right;">Page 29</p> <p>1 Q. Are they familiar to you? What do you recognize these</p> <p>2 to be?</p> <p>3 A. Maintenance repairs.</p> <p>4 Q. Okay. Do you recall who put these together?</p> <p>5 A. This would be from Alex Dupras.</p> <p>6 Q. Okay. And these are dated April 10, 2014; is that</p> <p>7 correct?</p> <p>8 A. That is correct.</p> <p>9 Q. Okay. Do you recall, Mr. Spreen, the circumstances of</p> <p>10 how these were put together?</p> <p>11 A. I told Alex to make sure he has his log book entries</p> <p>12 finished.</p> <p>13 Q. Okay. Do you recall when that was about that you told</p> <p>14 Alex that?</p> <p>15 A. After the accident.</p> <p>16 Q. Okay. Sometime in May of 2014?</p> <p>17 A. That is correct -- I'm sorry, I don't understand.</p> <p>18 Q. Yeah, sure. The accident was in early May --</p> <p>19 A. Okay.</p> <p>20 Q. -- of 2014.</p> <p>21 A. Okay.</p> <p>22 Q. I'm just trying to align that with what you were</p> <p>23 saying. Does that seem correct to you then, sometime</p> <p>24 in May of 2014?</p> <p>25 A. That's when I told them, correct.</p>

<p style="text-align: right;">Page 38</p> <p>1 one of the things he asked when he sent the log</p> <p>2 entries to you was whether there should be any</p> <p>3 changes; do you recall that?</p> <p>4 A. I do not recall.</p> <p>5 Q. Did you have a list of discrepancies that he needed to</p> <p>6 take care of after your log entry of February 7, 2014?</p> <p>7 MR. LORINGER: Objection to form, vague.</p> <p>8 BY MR. TECHMEIER:</p> <p>9 Q. You know what a list of discrepancies is, don't you?</p> <p>10 A. Yes.</p> <p>11 Q. Did you have it? Was there a list of discrepancies</p> <p>12 for this aircraft after you entered your log entry of</p> <p>13 February 7, 2014?</p> <p>14 A. I don't recall if there was a list.</p> <p>15 Q. You mentioned Valerie Varda before; do you remember</p> <p>16 that?</p> <p>17 A. Yes.</p> <p>18 Q. And is she married to Chad Kubick?</p> <p>19 A. No.</p> <p>20 Q. Do you know who she's married to?</p> <p>21 A. I do not.</p> <p>22 Q. Chad Kubick is not the son-in-law of Bruce Varda?</p> <p>23 A. No.</p> <p>24 Q. When Superior -- excuse me, when the FAA did their</p> <p>25 investigation of this accident, did you have to give</p>	<p style="text-align: right;">Page 40</p> <p>1 for QBE on this case?</p> <p>2 MR. LORINGER: Objection to form,</p> <p>3 foundation.</p> <p>4 A. I've spoke with Mr. Porter many a times throughout the</p> <p>5 years I've worked there. I don't recall talking to</p> <p>6 him about that particular case.</p> <p>7 BY MR. TECHMEIER:</p> <p>8 Q. What have you talked to Mr. Porter about then</p> <p>9 besides -- not -- not this case, but other, in other</p> <p>10 matters?</p> <p>11 A. Other insurance jobs that we had through Superior</p> <p>12 Aviation.</p> <p>13 Q. Would it have been accident claims?</p> <p>14 A. I don't recall that.</p> <p>15 Q. You stated that you visually inspected the fuel lines</p> <p>16 of this aircraft?</p> <p>17 A. Correct.</p> <p>18 Q. And you found that the fuel line was properly</p> <p>19 tightened?</p> <p>20 A. Which fuel line?</p> <p>21 Q. All the fuel lines.</p> <p>22 A. I inspected every fuel line and not one of them had a</p> <p>23 problem.</p> <p>24 Q. You did not torque any of the fuel lines?</p> <p>25 A. I did not torque any of the fuel lines.</p>
<p style="text-align: right;">Page 39</p> <p>1 any statements to them?</p> <p>2 A. No.</p> <p>3 Q. When the NTSB did their investigation of this</p> <p>4 accident, did you have to give any statements to them?</p> <p>5 A. No.</p> <p>6 Q. Did you give any statements to the insurance carrier</p> <p>7 for Superior, QBE?</p> <p>8 A. I don't recall.</p> <p>9 Q. If you had given a statement, you state that -- you</p> <p>10 have not reviewed any statement then that you might</p> <p>11 have given to QBE before your deposition today?</p> <p>12 A. Who is QBE?</p> <p>13 Q. The insurance carrier for Superior.</p> <p>14 A. I -- I don't have any recollection of -- of statements</p> <p>15 given to the insurance company.</p> <p>16 Q. Did they ever talk to you about this accident, besides</p> <p>17 Mr. Loring?</p> <p>18 A. If it was, it would have been very early, and that I</p> <p>19 don't recall.</p> <p>20 MR. KLINGAMAN: Excuse me, Mr. Spreen, if</p> <p>21 you could speak up a little bit, some of your answers</p> <p>22 are trailing off.</p> <p>23 BY MR. TECHMEIER:</p> <p>24 Q. You don't recall ever talking to a person by the name</p> <p>25 of Robert P. Porter, who is the -- who is the adjuster</p>	<p style="text-align: right;">Page 41</p> <p>1 Q. You didn't put a wrench to any of them?</p> <p>2 A. I did not put a wrench to any of them.</p> <p>3 Q. And you didn't touch any of them?</p> <p>4 A. I probably touched every one of them.</p> <p>5 Q. For what purpose?</p> <p>6 A. That's how I inspect, I run my fingers over things</p> <p>7 and -- and check for abnormalities.</p> <p>8 Q. So you would hand tighten something that was</p> <p>9 loosened -- that was loose?</p> <p>10 A. No.</p> <p>11 MR. LORINGER: Just a belated objection to</p> <p>12 form, foundation on that last question.</p> <p>13 BY MR. TECHMEIER:</p> <p>14 Q. Well, did you find that when you touched any of these</p> <p>15 fittings, that any of the fittings were loose?</p> <p>16 A. They were not loose.</p> <p>17 Q. Why did you touch them?</p> <p>18 A. That's part of my inspection process, you physically</p> <p>19 put your fingers on it to see if they move, and if</p> <p>20 they move in a different direction than they're</p> <p>21 supposed to, that was -- that's part of the -- that's</p> <p>22 part of my process of inspecting.</p> <p>23 Q. And if they move in a way that they're not supposed</p> <p>24 to, then what must be done; what do you have to do?</p> <p>25 A. See why it's doing what it's doing.</p>